

CAUSE NO. 2017-73050**INFINITY EMERGENCY
MANAGEMENT GROUP, LLC**
*Plaintiff,***v.****NEIGHBORS HEALTH SYSTEM, INC.,
NEIGHBORS HEALTH, LLC,
NEIGHBORS INVESTMENT GROUP,
LLC, NEIGHBORS GP, LLC, SETUL G.
PATEL, M.D., PAUL ALLEYNE, M.D.,
MICHAEL CHANG, M.D., ANDY CHEN,
M.D., CYRIL GILLMAN, M.D., QUANG
HENDERSON, M.D., DHARMESH
PATEL, M.D., AND HITESH PATEL, M.D.**
*Defendants.***IN THE DISTRICT COURT****HARRIS COUNTY, TEXAS****269TH JUDICIAL DISTRICT****RULE 11 STIPULATION OF DEFENDANTS' JOINDER IN THE
AGREED STIPULATION AND PROTECTIVE ORDER**

TO THE HONORABLE JUDGE OF THIS COURT:

Pursuant to Rule 11 of the Texas Rules of Civil Procedure, the parties to this case hereby consent and stipulate that Defendants, Neighbors Investment Group, LLC ("NIG"), Setul G. Patel, M.D., Paul Alleyne, M.D., Michael Chang, M.D., Andy Chen, M.D., Cyril Gillman, M.D., Quang Henderson, M.D. and Hitesh Patel, M.D. (collectively, "Individual Defendants") are parties to, joined in, and are afforded all rights and obligations under, the Agreed Stipulation and Protective Order ("Protective Order") signed by the Court on February 5, 2018.

I.

1. On January 31, 2018, Plaintiff, Infinity Emergency Management Group, LLC ("Infinity") and Defendants, Neighbors Health System, Inc., Neighbors Health, LLC, and Neighbors GP, LLC (collectively "Neighbors") filed the Protective Order.

2. The Protective Order inadvertently omitted reference to, and a signature on behalf of, NIG and the Individual Defendants.

3. The Protective Order was subsequently signed by the Court on February 5, 2018.

II.

4. As a result of the omission, the parties to this case file this Rule 11 agreement consenting and stipulating that NIG and the Individual Defendants are parties to, joined in, and are afforded all rights and obligations under, the Protective Order.

5. The attorneys' signatures on this document are evidence of their intent that this document be a Rule 11 Agreement, enforceable upon filing with the Court. Tex. R. Civ. P. 11.

AGREED:

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Neighbors GP, LLC***

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been sent via email and electronic service on the 3rd day of April, 2018, to the following counsel of record:

Mr. Simon W. Hendershot, III

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